



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

September 5, 2007

John Dougherty, Treasurer
International Brotherhood of Electrical
Workers Local 98 Committee on Political
Education
1719 Spring Garden Street
Philadelphia, PA 19130

Response Due Date:
October 5, 2007

Identification Number: C00162818

Reference: Mid-Year Report (1/01/07 – 6/30/07)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 3 items:

1. Please provide a Schedule B to support the entry reported on Line 28(c) of the Detailed Summary Page. Each refund made to a political committee must be itemized on Schedule B regardless of the amount refunded. 2 U.S.C. §434(b)
2. Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule B supporting Line(s) 21(b) and 29 of your report to clarify the following description(s): "Advertising Services" (to an individual), "Consulting Services", and "Operating Expenditure". For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).
3. Schedule B discloses an expenditure(s) for "Advertising Services". If a portion or all of these expenditures were for public communications (as defined by 11 CFR §100.26) or voter drive activity (under 11 CFR §106.6(b)(2)(i)) containing express advocacy as defined under 11 CFR §100.22, this would constitute an in-kind contribution or an independent expenditure and should be properly disclosed on a Schedule B or E supporting Line 23 or 24 as appropriate. Public communications and voter

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drive activity that refer to a clearly identified Federal candidate, but that do not expressly advocate the election or defeat of that candidate should be reported on Schedule B for Line 21(b) of the Detailed Summary Page. Please clarify whether this activity contained express advocacy and amend your report to properly disclose this activity, if necessary.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1398.

Sincerely,



Michael H. Hartsock
Senior Campaign Finance Analyst
Reports Analysis Division

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